

EXHIBIT B

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

JANE DOE,

Plaintiff,

-against-

COREY SHADER,

Defendant.

Index No.: _____

VERIFIED COMPLAINT

Plaintiff Jane Doe (“Ms. Doe” or “Plaintiff”), by way of her undersigned attorneys, as and for their Complaint against Defendant Corey Shader (“Shader” or “Defendant”) hereby alleges as follows:

NATURE OF THE ACTION

1. For nearly 18 months, Jane Doe was trapped in a cruel, dehumanizing, and extremely abusive relationship with Defendant, Corey Shader. Similar to the recent federal grand jury charges against Sean Combs (a/k/a “Puff Daddy,” a/k/a “P. Diddy”),¹ Shader subjected Ms. Doe to cruel forms of abuse—including verbal, physical, emotional, sexual, psychological, and digital.² Shader came as a wolf in sheep’s clothing. Initially, he presented himself to Ms. Doe as a reformed spiritualist who had helped himself and others recover from drug and alcohol addiction. In reality, he abused drugs and alcohol and used them to harm Ms. Doe and other women. He was

¹ See Sealed Indictment, *United States v. Combs*, No. 24-CR-00542 (S.D.N.Y. Sept. 17, 2024), <https://www.justice.gov/usao-sdny/media/1368556/dl>.

² Digital abuse is defined by the NDVH as “the use of technologies like texting and social media to bully, harass, stalk, or intimidate a partner,” noting that “[t]his behavior is often a form of verbal or emotional abuse, conducted online.” See Types of Abuse, Love is Respect, <https://www.loveisrespect.org/resources/types-of-abuse/>.

a real Jekyll and Hyde who took sadistic pleasure in tormenting Ms. Doe and exerting control over every aspect of her life, ensnaring her in a brutal cycle of domestic violence.

2. At the heart of domestic violence (“DV”) is an objective to assert power and control over survivors through various abusive tactics and behaviors.³ By employing these tactics, abusers trap survivors in a cycle of abuse, making it exceedingly difficult for them to leave. According to the National Domestic Violence Hotline (“NDVH”), one of the leading U.S. non-profit organizations dedicated to supporting DV survivors, on average, survivors attempt to leave an abuser seven times before succeeding, and the NDVH has identified 50 distinct obstacles that make it nearly impossible for survivors to leave.⁴ This is because “[e]xitting the relationship is the most unsafe time for a victim. As the abuser senses that they’re losing power, they will often act in dangerous ways to regain control over their victim.”⁵

3. The NDVH has categorized these abusive tactics and behaviors into two main groups: (i) overt physical and/or sexual violence; and (ii) more “subtle, continual behaviors over time.” NDVH lists several examples of these subtle behaviors, including using emotional abuse; isolation; coercion and threats; intimidation; children; and minimizing, denying, and blaming. Below is the Domestic Abuse Intervention Project’s Power and Control Wheel diagram, which illustrates the abusive behaviors that trap survivors in the cycle of abuse. Defendant, Corey Shader, employed nearly every tactic in the diagram below to trap Jane Doe in a cruel, dehumanizing, and extremely abusive relationship for nearly 18 months:⁶

³ See Power and Control, National Domestic Violence Hotline, <https://www.thehotline.org/identify-abuse/power-and-control/> (defining “domestic violence” as “a pattern of behaviors used to gain or maintain power and control”).

⁴ 50 Obstacles to Leaving, National Domestic Violence Hotline, <https://www.thehotline.org/resources/get-help-50-obstacles-to-leaving/#:~:text=Leaving%20is%20not%20easy,in%20the%20domestic%20violence%20field>.

⁵ *Id.*

⁶ See Power and Control, National Domestic Violence Hotline, <https://www.thehotline.org/identify-abuse/power-and-control/> (defining “domestic violence” as “a pattern of behaviors used to gain or maintain power and control”).



4. Shader would employ nearly every tactic described in the Power and Control Wheel, including making threats to hurt Ms. Doe and statements that he “could make her go away,” making her afraid by breaking objects, putting her down to make her feel bad about herself, threatening to commit suicide if she did not return to his house, calling her names, playing mind games, controlling her whereabouts, and treating her like a “servant” and suggesting that she needed to be his “slave.” These were not empty threats as Shader had never in their relationship demonstrated any ability to control his anger. His unmitigated rage often led to extreme physical violence. One example occurred in New York, where Shader, fueled by alcohol and drugs, hit Ms. Doe repeatedly in the face and slammed her head against the window of their Uber car for refusing to help him recruit a woman with whom Shader wanted to have a threesome. Other times, the

abuse was more insidious and psychological. After pushing Ms. Doe to establish a relationship and bond with his children from a previous marriage, he would then use his children to guilt her if she left.

5. Shader's abuse of Ms. Doe knew no bounds. Shader would verbally degrade Ms. Doe, often using a barrage of hateful, misogynistic, and racial epithets, including but not limited to "prostitute," "disgusting sick bitch," "trash," "bottom of the barrel, scum bucket trash," and a "filthy mutt."

6. Additionally, Shader had multiple firearms that he kept in his home and occasionally brought with him on trips out-of-town. In fact, in or about June of 2022, Shader took Ms. Doe with him into a gun store to purchase a firearm. He would often make statements that he could get away with harming someone by feigning trespass and shooting them if he could get them to come to his house. With this in mind, Ms. Doe was terrified that if she left Shader he could potentially attempt to harm or kill her without consequence. This is especially true considering that, as mentioned above, exiting a relationship with an abuser is the most dangerous time for the survivor.

7. Shader also obsessed over Ms. Doe's past romantic relationships, forcing her to disclose every intimate detail of her past sexual encounters in the format that he instructed. He would then weaponize the very information he pressured her to divulge to debase, shame, and eviscerate her self-worth. Shader took pleasure in exerting a maniacal level of control over Ms. Doe, requiring her to always enable her phone's read receipts to confirm whether she had read his messages and location tracker so that he could monitor her every step, inspecting every file in her iCloud account, and prying through her personal journal.

8. During their relationship, Shader emotionally manipulated Ms. Doe into believing that she owed him his every demand and deserved to grovel for his love, constantly judging her for, in his view, having led a life of sexual promiscuity that he disdained.

9. Shader convinced Ms. Doe that engaging in drug-fueled sexual encounters with him and strangers he mass messaged online or forced Ms. Doe to contact (over her protests) was a way for Ms. Doe to show her undying commitment to, and love for, him (“threesomes”). Shader would force Ms. Doe to engage in these threesomes with strangers and engage in drug abuse while his children were asleep in the same house.

10. Shader referred to the women he pressured Ms. Doe to contact as “leads” and the phone he used to text “leads” from as the “bitch phone.”

11. Whenever Ms. Doe refused or expressed any reluctance in participating in threesomes, Shader would relentlessly berate her, calling her a “stripper” and “worthless” to guilt her into feeling inadequate as a partner. He told Ms. Doe, a mixed-race woman of African American and Native American descent, that he, a white male, needed a “slave” who would comply with his every demand.

12. Shader frequently abused drugs and would surreptitiously drug Ms. Doe and other women with date-rape drugs, forcing them to submit to his sexual demands. To perpetrate this, Shader would give Ms. Doe and other women drugs that they had not consented to use. For instance, he would provide them with ketamine while claiming it was cocaine. He would also provide a much higher dosage to them than he claimed it was. With his ploy in play, Shader raped and sexually assaulted Ms. Doe and other women. Shader would become so physically violent with Ms. Doe during intercourse that Ms. Doe would bleed, become physically injured or visibly sick, or otherwise require medical attention.

13. Not only would Shader threaten physical violence, but he would also make good on those threats by grabbing, slamming her head into a car window, punching, kicking, pushing, spitting on her, and throwing glass objects.

14. After the abuse, Shader would often express his remorse to Ms. Doe, making empty promises to emotionally manipulate her into staying in this abusive relationship. Ms. Doe also took on a caretaker role for Shader's children, ensuring that they were fed, properly clothed, and insulated from Shader's erratic, drug-induced outbursts. Shader exploited this relationship, telling Ms. Doe that she would be abandoning not only him but also his children if she ever left.

15. Ms. Doe has suffered extensive pain, suffering, physical injury, emotional distress, loss of dignity, and long-lasting psychological harm due to Corey Shader's actions, including lifelong trauma for which she continues to seek extensive therapy.

16. In light of the foregoing, Ms. Doe brings this action to obtain redress for the severe pain, anguish, and emotional distress she endured at the hands of Corey Shader.

JURISDICTION AND VENUE

17. The Court has jurisdiction over Defendant pursuant to CPLR § 302(a)(2) because Defendant has committed a tortious act causing injury to Plaintiff within the county and state of New York.

18. Pursuant to CPLR § 503(a), venue is proper in this Court as Plaintiff is a resident of New York County and a substantial part of the acts giving rise to the claim occurred in New York.

PARTIES

19. Plaintiff Jane Doe is an individual who is a resident of the State of New York.

20. Defendant Corey Shader is an individual who is a resident of the State of Florida.

FACTUAL ALLEGATIONS

Ms. Doe and Shader Meet on the Seeking App

21. When Ms. Doe first met Shader, she was a successful businesswoman who founded and sold a lucrative livery service that provided transportation to those unable to drive safely after consuming alcohol. An automobile accident in which a drunk driver struck her vehicle inspired her to launch this business. Ms. Doe delved into several other business ventures over the years but decided to take a sabbatical in 2021 to travel, contemplate her next business move, and take care of her parents who were in poor health.

22. In or about October 2021, Shader began to court Ms. Doe after finding her profile on “Seeking,” a popular dating application that catered to wealthy, powerful men known as “sugar daddies” (the “App”).

23. After matching with Shader on “Seeking,” Ms. Doe was initially impressed by Shader’s purported spiritual journey, claim of altruism, and dedication to self-improvement. Shader portrayed himself as a healed individual who had stumbled in life but was well on a path to recovery from drug and alcohol addiction. Mr. Shader recounted to Ms. Doe the various times that he allegedly helped others recover from addiction and led them on meaningful spiritual retreats.

24. In March of 2022, upon Shader’s insistence, Ms. Doe moved into his Fort Lauderdale home to live with him. Soon after, Shader relapsed into abusing alcohol and drugs such as ketamine,⁷ cocaine, and gamma hydroxybutyrate (“GHB”),⁸ and it became clear that

⁷ Ketamine, also referred to as “Cat Tranquilizer,” “can induce a state of sedation . . . [and] [i]t is abused for its ability to produce dissociative sensations and hallucinations. Ketamine has also been used to facilitate sexual assault.” <https://www.dea.gov/sites/default/files/2020-06/Ketamine-2020.pdf>.

⁸ GHB is commonly known as “G” and reduces inhibitions and suppresses memory in those who take it. It can also, produce visual hallucinations and excited and aggressive behavior. GHB can also be used on victims to perpetrate sexual assault. (<https://www.dea.gov/factsheets/ghb-gamma-hydroxybutyric-acid>).

Shader's claims of spirituality and self-actualization were merely a façade. As he descended deeper into substance abuse, Shader's aggression toward Ms. Doe intensified, growing increasingly erratic.

Shader Manipulated Ms. Doe through Digital Abuse, Verbal Harassment, and Coercion

25. From the beginning of their relationship, Shader exerted a tyrannical level of control over Ms. Doe's life, demanding unfettered access to Ms. Doe's personal information, including her iCloud account, location, personal diary, and her romantic and sexual history through coercion and psychological manipulation. Shader attempted to justify his demands as an opportunity for Ms. Doe to "earn his trust."

26. Shader demanded that she allow him to always track her location through her iPhone. Below are text messages from Shader to Ms. Doe on or about August 9, 2022, that provide a small glimpse into Shader's obsession with controlling Ms. Doe's whereabouts:

Messages - Corey Shader

8/9/22 5:17 PM

I need to know where you are

Now

Just so you know. I told you if you take the location off it's official. Just wanted you to know that

There's nothing you can do that ever go back on that. I made a promise to you and I fuck you meant

27. Shader would constantly monitor Ms. Doe's location and whether the tracking feature on her phone was enabled. When Shader was unable to locate Ms. Doe, he would resort to verbal abuse. For example, Shader's text messages to Ms. Doe, on or about August 10, 2022, demonstrate the abuse Ms. Doe faced after she accidentally turned off her iPhone location tracker

and read receipts, with Shader cautioning Ms. Doe “Now location off too huh . . . I warned you about that”:

Messages - Corey Shader

6/10/22, 10:55 AM

I'm trying to [redacted]

I don't want to fight

I'm not trying to hurt you at all

And now you took off read receipts also.

Fuck you [redacted]

We please talk when I'm off work spend your time with your girls

You're unbelievable

I didn't mean to I quickly turned those things off I wasn't trying to turn the read receipts off

Stop

I was trying to turn the notifications on I was on the phone with you I guess I clicked all three off quickly

Not on purpose

Please stop

Now location off too huh

I warned u about that

28. When Ms. Doe's phone temporarily lost charge and died, Shader would again resort to vitriolic slurs and racist epithets, calling Ms. Doe a “sick bitch” and “bottom of the barrel, scum bucket trash,” stating “ur with some nig rn u filthy mutt.” Below is a text message exchange from Shader to Ms. Doe on or about August 17, 2023:

8:17/25, 4:34 AM
Corey Shader unsent a message.

Logging out of iCloud's, lol

Just know I known

Btw

I don't care about u even removing the other one

Done!!!!

Ty for the full closure u disgusting sick bitch u did it in Cali too

Hahaha ughhhh ur gross I hate u

You are trash. Want u to know that

Like, bottom of the barrel, scum bucket TRASH

OMFG ur disgusting

Wow

My phone dies for 5 mins

And this

You are unbelievable

NOT okay. Listen we not get her and figuring things out and I ask for space you don't allow it only think of you then you say if I don't do something you straight up didn't do just didn't care about me and actually chose to hurt me for asking saying we are not the same and I don't get that and don't even ask and harm me for asking something if you that I always did for you. You never do it even as a gesture to show you some sick value and respect me or are capable of even caring about me or what I want or need

Ur with some nig rn u filthy mult don't talk to me

29. Shader also raided Ms. Doe's personal journal and demanded full control of her Apple iCloud account. He would meticulously comb through her account's photographs, text messages, and prior direct messages contained in dating apps, using this information to torture her about her past and call her a "prostitute" for dating other men, a label that he forced her to adopt and eventually convinced her to believe.

30. Shader obsessed over Ms. Doe's prior romantic relationships and sexual history with intimate partners, demanding to know every detail about her past and interrogating her about any photographs that she took with other men.

31. On or about November 1, 2022, after discovering Ms. Doe's interaction with an unknown male, Shader demanded, via text, an updated comprehensive description of Ms. Doe's past romantic and sexual history (not to be written in "essay format"), including details such as (i) the nationality of each partner; (ii) her motives for her romantic involvement (such as whether "[she] w[as] just a rachet ass and wanted some dick") and how she had "used" her past partners; and (iii) where each partner ejaculated. Calling her a "slut," Shader also threatened Ms. Doe that "if [she] lie[d] it's not going to be good." Below is the relevant text message exchange:

Messages - Corey Shader

11/11/22, 3:57 PM

About I walk out

Jesus Osey please why are you being like this

I parked next door baby

I'm really trying to think about who I was with. I'm thinking about if I went on a date with someone or met ppl or if it was our friend that sold or if I picked up my car from somewhere or is there another person I'm forgetting from the list. I'm sorry I was such a slut. I honestly don't remember the persons license or who I was with. The first message talking about something with Uber but I'm in my car then it has a piece of man etc. I don't recognize the names that you showed me.

Well u assume u drove. You sound sober in all the videos

But slut or not-driving to a house w no number saved at 10pm on a Monday night just days after logging back in to your SA account creating new ones and downloading texting apps points to one thing

And since you're a liar

I can't believe u and I won't

U better think fast

[...]

11/1/22, 3:57 PM

Updating list w new ppl
The sequential order of everyone.
Where u specifically met each of them.
Where/ when it happened
Why u did/what motives were (if you were using them-what for? was it
status? trying to cover something up/feel better about yourself/just do it
bc they have u attention and felt like you should?
If high vibration out of respect for other ppl don't say "I wanted to" just
say high vibe. If u were just a ratchet ass and wanted some dick, say
"one of those nights"
Where each person nutted. If u don't remember say so.
Don't lie-if you lie it's not going to be good.
Be honest

If u don't Fucking LIE we should
Be done

Be Humble. Read the rest of the stuff I didn't pick up last list.

And include the old man and Robert and fucking everyone

Idc if u think I know. Be thorough

Don't write it in essay format pls

I prefer nationality but since U don't see color guess can't make u

Also, I'm going to need an answer on that. Just simply too sketch-sorry.
Plus I don't trust u one bit. This would be a good way to earn trust

Either way I won't tolerate I forgot as an answer

Ok

Well I'm going to drop the vehicle off and get a Airbnb. And sit and do as
you say

Okay u child

xD

Hahahaha

Please don't be a asshole

xD

You went home to be in trouble

I'm going to sit and do it

K

Clown

Why

What is wrong with you

32. Shader further weaponized the very information that he coerced her to disclose by requiring Ms. Doe to complete the Alcoholic Anonymous 12-Step program to (i) force her to admit to being a “prostitute”; and (ii) prove to him that she was dedicated to healing from her life experiences of which he disapproved.

33. Below is a text message exchange between Shader and Ms. Doe on or about November 2, 2022, where he repeatedly accuses Ms. Doe of prostitution:

Messages - Corey Shader

11/2/22, 9:40 AM

Love you!

I don't believe u

U don't sleep at a older guys house and don't fk

He wouldn't

And you wouldn't sleep there

Wtf who tf

Do u consider that prostituting yourself

Questioned "Do u consider that prostituting yourself "

Add that to another u prostituting yourself

Add it

[. . .]

How u could even think to yourself that anything w this guy was anything less than prostitution you're sick

At this time I did

And it was sick

34. In an argument with Ms. Doe on or about May 5, 2023, Shader told Ms. Doe she was "unruly," "too out of line off [he]r leash," and that he "just need[ed] a slave":

Messages - Corey Shader

Message
5/5/23, 7:17 PM

Need compliance to reciprocate love

Ur unruly

Ur too out of line off ur leash I don't even know how to get it back

I'm not okay with you or anyone being so out of line

I just need a slave

35. To further subjugate and manipulate Ms. Doe, Shader would (i) threaten to post sexually explicit videos and photographs of her if she refused his sexual demands; and (ii) disparage Ms. Doe as an inadequate sexual partner.

36. On or about November 13, 2022, Shader shamed Ms. Doe when she refused to perform oral sex, complaining that he really "needed it" and that it was "fucking sad" that she could not satisfy him:

Messages - Corey Shader

11/13/22, 12:01 AM

Nah not now. Really needed it

It's whatever. How fucking sad

I feel alone. So yes I called my mom.

Liked "I feel alone. So yes I called my mom."

Thanks

You bbs are always put first

You said spaces is good. I always said no to that but today I said yes

And this is how you react

You esicback and took left to right

Huh lol than nice. med then not. Your fucking with me

Do whatever u think is right by me

Yourself that's the way it's always been

Since day one

No it's not

U are a very selfish person.

Shader Forced Ms. Doe to Participate in Sex Threesomes

37. Shader regularly forced Ms. Doe to participate in threesomes with women whom Shader recruited or forced Ms. Doe to recruit on various dating apps, including "Seeking," through accounts he created using Ms. Doe's personal information. Shader convinced Ms. Doe that this was another opportunity for Shader to re-gain Ms. Doe's trust, and he would become verbally and physically abusive if Ms. Doe refused.

38. Below are text messages from Shader to Ms. Doe, on or about May 13, 2023, chastising her for not wanting to engage in threesomes:

Messages - Corey Shader

5/13/23, 8:49 AM

[...]

I don't get 3sums. Not at all anymore. And when I did, there's easily been 20 totally different excuses as to why they were bad and why it's my fault. So I'd change it and there's be another reason "if only if....(blank)" and (blank keeps changing). That's 100% YOU.

Making me feel like I don't even wanna have threesomes it's been months and this would be around half this time. I would've said listen this is not OK. This is something that I need. But I just get blamed for it. I've had so many horrible experiences, so many things thrown in my face that took place 90 days ago or even nine months ago that it's simply not fair and therefore it's almost like I don't even want them

You don't give me what I need.

I'm telling you right now that if you don't give me all the above and everything I need I don't want you to come back because I'm starting to get used to you not being here. I miss you more than I've ever missed you before but I'm tired of everything being my fault. If you don't step up and go the extra mile and all of these areas, I don't wanna be in this relationship anymore.

And yeah I don't know how many times but I'm gonna need three cents more than twice a month if you can't deal with that tell me now

39. Well-aware of Ms. Doe's reservations, Shader would surreptitiously drug Ms. Doe and the women participating in the threesomes to coerce them into his sexual demands. Shader sedated Ms. Doe and other women with GHB and ketamine and sexually took advantage of them while their faculties were severely diminished. He would claim to give them cocaine but in actuality give them ketamine or he would mix GHB in much higher dosages than what he had disclosed to them to lure them into compliance and drown out their reluctance.

Shader's Harassment of Ms. Doe at the Workplace

40. From on or about July 2022 until December 2022, Ms. Doe worked for Shader at his company, Insurance Pipeline, Inc., and his abuse and harassment would continue even while Ms. Doe was at the workplace.

41. In or about October of 2022, Shader removed Ms. Doe from his main office building and isolated her in an office by herself to prevent Shader's other employees from witnessing his abusive behavior.

42. On or about October 29, 2022, Shader again became enraged when he was unable to log in to Ms. Doe's iCloud account. He threatened Ms. Doe via text messages that he would kick her out of his office:

Messages - Corey Shader

10/29/22, 12:11 PM

Wowww

Tried again I'll kick you out of my office building

Put your stuff out on the street. Please don't make me be that guy

Your still logged on aren't you? I wanted to see what your talking about
You told me to show the therapist. Log back on if u want didn't know it
I would kick you out.

Nope

Don't worry ab any of that

43. Shader would also whisk Ms. Doe away from her desk to accompany him on out-of-state trips to avoid court-imposed drug screenings that were required as part of a custody arrangement for his children from a prior marriage.

44. Shader also required Ms. Doe to help him conceal his drug use by having her purchase various detox supplements to evade detection.

45. Shader even weaponized his young children, with whom Ms. Doe had developed a close relationship, to guilt Ms. Doe into refraining from disclosing his drug abuse to his ex-spouse, stating that his children would be taken away from him if she did so.

Shader Regularly Drugged, Sexually Assaulted, and Raped Ms. Doe

46. Shader's behavior toward Ms. Doe progressed beyond verbal abuse and manipulation into routine sexual assault, rape, and physical abuse.

47. Often unbeknownst to them, Shader would slip a cocktail of high dose date rape drugs, including GHB and ketamine, into the drinks of Ms. Doe and other women, and would sexually assault them while they were not fully conscious. Shader would also become aggressive with Ms. Doe whenever she refused to take drugs.

48. In or about July 2022, Shader became enraged with Ms. Doe and spit in her face.

49. On or about August 16, 2022, Shader grew violent with Ms. Doe during intercourse and smacked her. When Ms. Doe expressed to Shader that he was being too rough, Shader grew increasingly physically aggressive.

50. In or about August or September of 2022, Shader became angry with Ms. Doe, throwing a water bottle and towel at her, pushing her on the ground, and yelling at her.

51. On or about October 17, 2022, Shader gave Ms. Doe a powdery substance that he told her to take to "sober up" after she had been drinking alcohol. Ms. Doe then fell unconscious.

As she dozed in and out of consciousness, Shader was on top of Ms. Doe forcefully penetrating her.

52. On or about November 10, 2022, Shader became aggressive with Ms. Doe during intercourse for over a half hour, constantly shoving her head. Ms. Doe suffered pain in her back, wrist, neck, and jaw due to Shader's rough conduct. Shader also became verbally abusive, and Ms. Doe awoke to Shader on top of her, attempting to forcefully penetrate her.

53. In or about November or December 2022, Shader forcefully penetrated Ms. Doe while she was incoherent. Shader became enraged, yelling and becoming verbally abusive toward Ms. Doe. Shader then dragged Ms. Doe out of the room, shook and slapped her, and pushed Ms. Doe in the bathroom. Shader then left the apartment. As a result of this encounter, Ms. Doe sought care from a chiropractor for back and neck injuries that she sustained during oral sex with Shader that night.

54. On or about March 14, 2023, Shader was physically aggressive with Ms. Doe during oral sex and penetration, causing her to bleed. Ms. Doe asked Shader to stop being so aggressive, after which Shader began to yell at Ms. Doe.

55. On or about March 20, 2023, Shader gave Ms. Doe ketamine. Shortly thereafter, Ms. Doe's faculties diminished, and Shader raped Ms. Doe and video recorded the interaction.

Shader Physically Abused Ms. Doe

56. Ms. Doe endured not only verbal, emotional, and sexual abuse, but also physical abuse at the hands of Shader—especially during his drug-fueled arguments.

57. On or about August 9, 2022, Shader spat in Ms. Doe's face. Below is a text message exchange between Shader and Ms. Doe immediately after this physical altercation:

Messages - Corey Shader

3/9/22, 9:17 PM

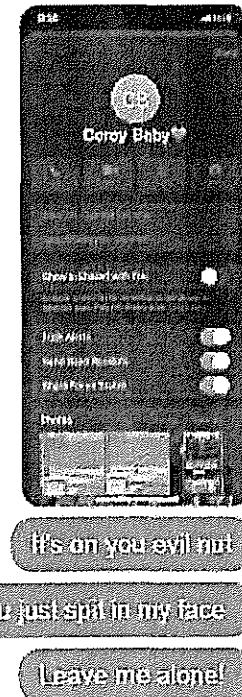
It's over

I need to know where you are

Now

Just so you know. I told you if you take the location off it's official. Just wanted you to know that

There's nothing you can do that ever go back on that. I made a promise to you and I fuck you meant



58. On or about August 26, 2022, when Ms. Doe refused to participate in a threesome Shader wanted to arrange, Shader hit her and kicked her in the stomach. Below is a text message from Shader admitting to physically harming Ms. Doe:

Messages - Corey Shader

9/26/22, 12:35 AM

It's over shea

Go home

I'm getting violent this isn't okay

I won't be coming back there and we won't be seeing each other again

59. On or about October 29, 2022, Shader pushed Ms. Doe and struck her in the face with a towel.

60. On or about November 4, 2022, Shader attacked Ms. Doe while she was in bed by grabbing her face, spitting on her, pushing and hitting her, and kicking her out of his home. Below is a text message exchange between Ms. Doe and Shader immediately after the altercation:

Messages - Corey Shader

11/4/22, 7:56 AM

You hit me. After kicking me out. Not talking to me. You are unbelievable

Thanks though. Thought you had integrity and were an adult. Couldn't even talk you just came in to attack me out of bed and told me to leave wouldn't even look through the stuff with me like I begged you on the phone and come back and do and like I said 3 times yesterday and even while you were doing it last night

You kicked me out like garbage again

Don't know how you can even be okay with how you are. Or not be sorry

I didn't want u to leave

And feel awful about how angry I got

Talking won't work

61. On or about February 2, 2023, while on a trip in the Dominican Republic, after instigating an argument with Ms. Doe, Shader proceeded to hit her and throw wine glasses and bottles at her.

62. On or about March 27, 2023, while on a trip in the Bahamas, Shader pulled Ms. Doe out of bed, hit her, threw wine in her face, and broke her cellular phone.

63. On or about April 30, 2023, Shader, while intoxicated, grabbed and hit Ms. Doe in the face in the presence of his then five (5) year old daughter.

64. On or about May 4, 2023, while Ms. Doe was in bed, Shader struck her in the face and pushed her out of the bed.

65. On or about May 13, 2023, Ms. Doe expressed to Shader how damaged her self-esteem was by his demands for threesomes at least twice a month. As he normally did, Shader responded by manipulating Ms. Doe, stating that her participation demonstrated her love for him. As the conversation progressed, Shader threatened her stating, "don't make me clock u." Below is the text message exchange between Shader and Ms. Doe:

Messages - Corey Shader

Don't you see? I want you to love me so much that you would just do something fucking hated, and by seeing me happy it would instantly make you love doing it. That's love.

That is how things are my love
Open your eyes baby
I would do anything

➔ Replying to you, 2023-05-13 12:12:17: « How do you go from wanting a life with someone to this? »

Everything just sort of hit me last night. I hate so many things about the first year we were together. I hate everything about your past everything. At least I could take a girl who is willing to do such horrible disgusting things to her self. Roni Fertig is something that actually is healthy for our relationship if you just felt secure. It's just isn't the way I envision this relationship going with you and this is definitely not the way envision my wife going with the next person I decided to dedicate myself to. I have to go I don't wanna talk.

➔ Replying to you, 2023-05-13 12:12:48: « That is how things are my love »

Stop!!!!

⌚

Stop

No more

Don't make me clock u

Stop

66. On or about May 24, 2023, Shader and Ms. Doe attended a music festival. During that trip, an argument ensued in which Shader threw a phone at Ms. Doe's face, ripped her out of bed, spit on her, and hit her in the face after Ms. Doe refused to call a female individual to come to their hotel to engage in a threesome. Below are text messages from Shader to Ms. Doe expressing remorse for throwing the phone:

Messages - Corey Shader

5/24/23, 9:11 AM

Can you be approachable

I'm sorry about the phone. That was low of me. Are u willing to be approachable, just this once?

Can you just give me something to work with please. You're not the only person that is hurting.

I'm really not good right now. And I know you're not either.

67. This is exactly how Shader held Ms. Doe captive in a vicious cycle of domestic abuse for nearly two years. Shader would become physically and verbally abusive, and then acknowledge his abusive behavior, apologize, and feign remorse. But, somehow, Ms. Doe was always to blame for bringing the worst side out of Shader. Below is a text message from Shader to Ms. Doe, on or about June 9, 2023, manipulating Ms. Doe and justifying his abusive behavior:

Messages - Corey Shader

6/9/23, 9:42 PM

I'm gonna say one thing. If you could have just sucked it up and dealt with me when I'm at my worst and spinning a little bit. It would've gotten less and less and less and less. And you would've had the guy of your fucking dreams. And deep down very deep somewhere beneath all of that anger and pent-up rage and behind all the pain that I know I've caused you. I know deep down that you know it and you're gonna regret this for the rest of your life.

Oh, and by the way. When you were the sweet girl and I abuse you, it was because you lied. And I never forgive you. But finally I did and then all of this other stuff came up. Well, guess what? I finally was at a point where I wanted to really reset with you. But this was something that I needed not to abuse you, but something I needed to get over all of the anger that you directed toward me. I did it to you for so long but frankly, you deserved it. But now you don't. But I was so used to being the aggressor and I was so used to you being the sweet girl I did not ever lash out, I don't even know how to look at you. I'm still looking at you sideways like, is this really her? anyways, you could've had a relationship beyond your wildest dreams. And you know it. Honestly, as much as I'm gonna lose out, so are you. Both of us well. But deep down, you know I'm right. You will regret this forever.

But I think it's easy enough for you to admit that you're just not able to reset. And that's an entirely different story. At least, if you were honest about that, we took a break and then you could've seen what happens from there. But, you didn't want to do that. So I told you what I needed. And now you're showing me that I'm not worth it to you. So this makes it entirely easy for me now

Well, as easy as it can to know that you're giving up on a very powerful, loving another person that you'll probably never love someone so much ever again. But still, at least I can sit here holding my head high, knowing that when you tell me that you can do it that you could. And if you could, and this is your choice, and shame on you, it makes it even easier and you don't deserve.

68. On or about October 3, 2023, Ms. Doe decided to surprise Shader with dinner reservations at Carbone and a concert. That night, Shader, became belligerently intoxicated, threw a drink in Ms. Doe's face and spit on her multiple times. Shader continued to verbally berate and

physically abuse Ms. Doe while speeding home, driving erratically, screaming at, and spitting on Ms. Doe.

Shader Physically Abused Ms. Doe in New York

69. On or about June 10, 2023, Shader, Ms. Doe, Shader's children, his ex-spouse, and the nanny arrived at the Mark Hotel in Manhattan, New York to attend the wedding of Shader's friend. During the wedding reception, Shader became extremely intoxicated. During the Uber ride back to the hotel, Shader insisted that Ms. Doe invite a woman with whom Shader wanted to have a threesome back to the Mark Hotel. After Ms. Doe refused, Shader became enraged, proceeding to repeatedly strike Ms. Doe in the face and slam her head against the window of the Uber car, resulting in a bloody lip. The next day, Shader sent the following text message to Ms. Doe admitting his abusive behavior:

Messages - Corey Shader

6/11/23, 3:17 PM

I'm so sorry for being verbally and physically abusive to you. And abusing your trust in me in the beginning. I feel very lost. Just want to make u feel as special as you are to me. We both deserve better. I know you do. You're so much more special, valuable, and better than the way I make you feel.

I'm very sorry for everything I've done to harm you all this time

You deserve better

I can't forgive myself either

I hit u

I'm not okay with being abusive

I hate myself for it.

I'm not a good person with you

I'm not loving or gentle or accepting

I'm just a bad version of myself

70. On or about June 24, 2023 and September 5, 2023, Shader again admitted to the various forms of abuse he perpetrated against Ms. Doe throughout their relationship via text message:

Messages - Corey Shader

6/24/23, 10:32 AM

[...]

yell. You yell and yell even when I have children in the house. That was my number one rule. I've gotten to the point that I'm putting my hands on you. Neither of us have any self control.

[...]

Messages - Corey Shader

9/5/23, 10:20 AM

We aren't even. I was worse. It doesn't matter. Wasn't even that. It was what proceeded it all. I was abusive in so many ways I made u the way u were. The things I said...I am so so sorry for how I wronged u, I'll spend forever making it up to you. On my kids.

[...]

I was playing control games yesterday. But horrible timing. I should be kissing ur ass rn. I have catching up to do. Maybe one day youll respect my masculine energy or my intellect or ability to protect you emotionally and physically.

[...]

[REDACTED] taking u on trips that weren't for you. Blaming U for my bad decisions and hair. Being abusive. Forcing sexual situations neither of us even wanted. I was harming myself also. I'm sorry for the drugs the comparisons...I never meant one. Just to hurt you.

71. As a result of the extensive abuse that Ms. Doe suffered at the hands of Shader, she experiences flashbacks, nightmares, intrusive memories, and cognitive and behavioral avoidance

of the reminders of her traumatic experiences. To a reasonable degree of medical certainty, Ms. Doe now suffers from lifelong trauma that impacts her daily functioning and for which she requires extensive psychological and medical care due to Shader's verbal, psychological, emotional, psychological, sexual, and physical abuse.

FIRST CAUSE OF ACTION

(Intentional Infliction of Emotional Distress)

72. Ms. Doe incorporates by reference all preceding paragraphs and re-alleges them, as if fully set forth herein.

73. Shader committed intentional infliction of emotional distress against Ms. Doe by engaging in extreme and outrageous conduct, by verbally abusing, raping, sexually assaulting, physically striking, forcing Ms. Doe to consume drugs and engage in threesomes, and spitting on her with an intent to cause or disregard of a substantial probability of causing severe emotional distress to Ms. Doe.

74. Shader's conduct was the direct and proximate cause of Ms. Doe's past and future severe emotional distress, psychological trauma, and bodily harm.

75. This action is timely because it falls within CPLR § 215(9), as Ms. Doe is a "victim of domestic violence" within the meaning of Section 459-a of the Social Services' Law, and the action is brought during the two-year time period set forth in CPLR § 215(9).

SECOND CAUSE OF ACTION

(Battery)

76. Ms. Doe incorporates by reference all preceding paragraphs and re-alleges them, as if fully set forth herein.

77. Shader committed battery against Ms. Doe when he raped, sexually assaulted, physically struck, and spat on her.

78. Shader intentionally, and without her consent, attacked Ms. Doe for his own sexual and sadistic gratification. At various times, Shader continued to attack, sexually assault, and rape Ms. Doe after he had drugged her unconscious. Shader's various instances of physical contact with Ms. Doe were offensive, unlawful, wrongful, and objectionable under all circumstances.

79. Shader's conduct was the direct and proximate cause of Ms. Doe's past and future substantial damages, including extensive pain and suffering, physical injury, severe and long-lasting psychological and emotional harm, and loss of dignity.

80. This action is timely because it falls within CPLR § 215(9), as Ms. Doe is a "victim of domestic violence" within the meaning of Section 459-a of the Social Services' Law, and the action is brought during the two-year time period set forth in CPLR § 215(9).

THIRD CAUSE OF ACTION

(Assault)

81. Ms. Doe incorporates by reference all preceding paragraphs and re-alleges them, as if fully set forth herein.

82. Shader committed assault against Ms. Doe when he verbally abused Ms. Doe, and threatened and attempted to physically strike her, placing Ms. Doe in reasonable and imminent apprehension of harmful contact.

83. Shader intentionally abused Ms. Doe and repeatedly admitted to doing so.

84. Shader's conduct was the direct and proximate cause of Ms. Doe's past and future substantial damages, including extensive pain and suffering, physical injury, severe and long-lasting psychological and emotional harm, and loss of dignity.

85. This action is timely because it falls within CPLR § 215(9), as Ms. Doe is a "victim of domestic violence" within the meaning of Section 459-a of the Social Services' Law, and the action is brought during the two-year time period set forth in CPLR § 215(9).

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that judgment be entered in Plaintiff's favor and against Defendant as follows:

- A. An award of monetary damages to Plaintiff in an amount to be proven at trial.
- B. An award of any such other relief as the Court deems just, proper, and equitable.

Dated: New York, New York
December 17, 2024

Respectfully submitted,

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Attorneys for Plaintiff

VERIFICATION

STATE OF NEW YORK)

) ss.:

COUNTY OF NEW YORK)

JANE DOE, being duly sworn, deposes and states:

I am the Plaintiff in this action. I have read the annexed complaint, and its factual contents are true to my personal knowledge, except as to the matters alleged on information and belief, and as to those matters, I believe them to be true.

I affirm this 17th day of December 2024, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.

Dated: New York, New York
December 17, 2024

Jane Doe

Jane Doe

Sworn to before me
this 17th of December 2024
Dianna Liriano
Notary Public

DIANNA LIRIANO
Notary Public, State of New York
No. 01LI6379905
Qualified in New York County
Commission Expires Aug. 27, 2026